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# Privacy Policy

This Privacy Policy explains how Quarantine Services Australia Pty Ltd (**QSA**) ABN 75 653 253 395 collects, uses and discloses personal information relating to users of our services.

QSA is committed to protecting your privacy, and is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and Australian Privacy Principles (**APPs**) in relation to the handling of personal information. We also comply with the European Union General Data Protection Regulation (**GDPR**) insofar as we collect and process personal information about individuals located in member countries of the European Economic Area (**EEA**).

In this Privacy Policy, personal information means information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified.

## Personal information we collect and hold

The types of information we collect about you depends on the dealings you have with us, and may include:

- name, contact details and identification information;
- travel and accommodation information;
- information about services requested by or provided to you;
- payment and credit card information;
- health information, including information about COVID-19 testing and vaccination status.

Where possible and lawful, you may interact with us anonymously or using a pseudonym (for example, when making a general enquiry). However, if you do not provide requested information, we may not be able to provide our services to you.

## How we collect personal information

We may collect personal information about you in different ways, including:

- directly from you;

- from your authorised representative or agent;
- via our website;
- through third parties with whom we interact in order to provide our services (including travel and accommodation providers); and
- from Commonwealth, state and territory government agencies.

### ***Cookies and related technologies***

We use cookies, data analytics and related technologies to collect information relating to your interaction with our website and online content. While we do not use browsing information to identify you personally, we may record certain information such as your device's IP address, geographic location (country, state), information about the web pages viewed (e.g. date, time, pages visited, and search terms. We collect this information to improve our website functionality and personalise content.

You can disable cookies through your device or internet browser, but please note that this may affect your ability to use certain website features.

## **Purposes for which we collect, use, process and disclose personal information**

We collect personal information to:

- provide our services;
- manage and conduct our business;
- comply with our legal obligations, resolve any disputes, and enforce our agreements and rights with third parties; and
- comply with government policies and directions, including those relating to public health.

We will generally only use personal information for the purposes for which it was collected. We may use or disclose personal information for other purposes with your consent, where authorised or required by law, or otherwise where permitted under privacy law.

## **Disclosure of personal information**

We may disclose your personal information to:

- your authorised representative or agent;
- our quarantine services partner, Aspen Medical;
- our contracted service providers and professional advisers;
- transport and accommodation providers; and
- Australian government agencies, regulatory bodies and law enforcement agencies.

### ***Disclosure outside Australia***

Some of our contracted service providers may be located outside of Australia.

If you are in a country that is a member of the EEA, we and our service providers will transfer your personal information outside the EEA only where relevant protections are in place. We will take steps to ensure your personal information will be afforded the level of protection required of us and our service providers in accordance with applicable data protection laws and current legally recognised data transfer mechanisms, such as:

- where the country has been deemed adequate by the European Commission (EC);
- where a valid Privacy Shield certification exists (in the case of a data transfer to a Privacy Shield certified US recipient); or
- by adopting appropriate EC approved standard contractual provisions.

Overseas organisations may be required to disclose information we share with them under an applicable foreign law.

## Security and Storage

We store your personal information in hard copy and electronically in data centres located in Australia. We take all reasonable and appropriate steps (including organisational and technological measures) to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We only keep your information as long as we require it:

- for the purposes for which it was collected;
- for our business operations; or
- in accordance with, and for the purposes of, applicable laws.

If we no longer need to hold your personal information for any reason or we are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.

- as necessary with law enforcement bodies and other authorities where we are required or authorised to do so by law; or
- with other third parties at your request or otherwise with your consent.

## Your rights

### ***Accessing your personal information***

You can ask us to access the personal information we hold about you by making a request in writing to our Privacy Officer on the contact details below.

We will respond to our request promptly, but may need to verify your identity before providing access to your information.

We will generally give you access to your information, unless doing so would adversely impact the privacy rights of others, or there is a legal reason why we are unable to do so. If we refuse your request, we will give you written notice of our decision, including our reasons and how to complain if you are not satisfied with our decision.

## ***Correcting your personal information***

If you think the personal information we hold about you is incorrect, please contact us by writing to our Privacy Officer on the details below.

## ***Additional rights for EEA country residents***

If you are in a country that is a member of the EEA, you can, in certain circumstances:

- obtain information about the processing of your personal information;
- ask us to erase your personal information, such as if you withdraw your consent and we are not otherwise legally entitled to retain it;
- object to, and ask us to restrict, our processing of your personal information, although we may continue to process your personal information while we verify your assertion that your information is inaccurate, or if we are processing your information for our legitimate interests;
- receive some personal information you have given us in a structured, commonly used and machine-readable format, or ask us to transmit it to someone else if technically possible feasible; and
- withdraw your consent (but we may be able to continue processing without your consent if there is another legitimate reason to do so). The withdrawal of your consent will not affect the processing of your information to which you had consented.

## **How to make a complaint or inquiry**

If you have a complaint or question about how we handle your personal information, please contact us on the details below.

We will investigate and respond to your complaint or question within a reasonable period, and within 30 days.

If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner on the details below.

Office of the Australian Information Commissioner

Phone: 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001

Online form: [www.oaic.gov.au](https://www.oaic.gov.au) (<https://www.oaic.gov.au/>) (Privacy Complaint Form)

## **Contact us**

Please contact us if you have any questions or comments about this Privacy policy, or if you wish to exercise your rights under applicable privacy laws using the following details:

Post: 18 National Circuit Barton ACT 2600

Email: [privacy@quarantineservicesaustralia.com.au](mailto:privacy@quarantineservicesaustralia.com.au) (<mailto:privacy@quarantineservicesaustralia.com.au>)

## Changes to this privacy policy

We may, from time to time, update this privacy policy to ensure that it reflects any changes to our business or changes in the law. Any changes will take effect from the time that they are posted on our website.

*Last updated: 21/09/2021*

We acknowledge the traditional custodians of the lands and waters where we live and work, and pay respects to Elders past and present.

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